

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD.,
HAYMAN CAPITAL MANAGEMENT, L.P., AND
CALIFORNIA STATE TEACHERS' RETIREMENT
SYSTEM, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

UBS AG, UBS SECURITIES JAPAN CO. LTD.,
MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST
AND BANKING CO., LTD., THE NORINCHUKIN
BANK, MITSUBISHI UFJ TRUST AND BANKING
CORPORATION, SUMITOMO MITSUI BANKING
CORPORATION, RESONA BANK, LTD., J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, NATIONAL ASSOCIATION, J.P. MORGAN
SECURITIES PLC, MIZUHO CORPORATE BANK,
LTD., DEUTSCHE BANK AG, DB GROUP
SERVICES UK LIMITED, MIZUHO TRUST AND
BANKING CO., LTD., THE SHOKO CHUKIN
BANK, LTD., SHINKIN CENTRAL BANK, THE
BANK OF YOKOHAMA, LTD., SOCIÉTÉ
GÉNÉRALE SA, THE ROYAL BANK OF
SCOTLAND GROUP PLC, THE ROYAL BANK OF
SCOTLAND PLC, RBS SECURITIES JAPAN
LIMITED, RBS SECURITIES INC., BARCLAYS
BANK PLC, BARCLAYS PLC, BARCLAYS
CAPITAL INC., CITIBANK, NA, CITIGROUP, INC.,
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL
MARKETS JAPAN, INC., COÖPERATIEVE
CENTRALE RAIFFEISEN-BOERENLEENBANK
B.A., HSBC HOLDINGS PLC, HSBC BANK PLC,
LLOYDS BANKING GROUP PLC, LLOYDS BANK
PLC, ICAP PLC, ICAP EUROPE LIMITED, R.P.
MARTIN HOLDINGS LIMITED, MARTIN
BROKERS (UK) LTD., TULLETT PREBON PLC,
BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., MERRILL LYNCH
INTERNATIONAL, AND JOHN DOES NOS. 1-50,

Defendants.

DOCKET NO. 15-cv-05844-GBD

**DECLARATION OF REBECCA K. SMITH IN SUPPORT OF
J.P. MORGAN SECURITIES PLC's MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

I, Rebecca K. Smith, hereby declare:

1. I am an Executive Director and Assistant General Counsel of JPMorgan Chase Bank, N.A., London Branch. I submit this declaration in further support of the motion to dismiss the above captioned action for lack of personal jurisdiction of J.P. Morgan Securities plc (p/k/a J.P. Morgan Securities Ltd.) ("JPMS plc"). I have personal knowledge of the facts set forth herein based on my work at JPMS plc and my review of relevant records.
2. JPMS plc is a financial institution incorporated under the laws of England and Wales. During the time period January 2006 to end of June 2011, JPMS had its headquarters located at 125 London Wall, London EC2Y 5AJ. Since July 2012, its headquarters are and have been located at 25 Bank Street, Canary Wharf, London E14 5JP. JPMS plc's principal place of business is and has been in London, England.
3. JPMS plc did not have any branches, offices, or employees in the United States from January 2006 to end of June 2011.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: London, England
January 26, 2016

A handwritten signature in black ink, appearing to read "Rebecca K. Smith", written over a horizontal line.

Rebecca K. Smith
Executive Director and Assistant General Counsel
JPMorgan Chase Bank, N.A., London Branch